

KARA B. HENDRICKS, Bar No. 07743  
hendricksk@gtlaw.com

JASON K. HICKS, Bar No. 13149  
hicksja@glaw.com

KYLE A. EWING, Bar No 014051  
ewingk@gtlaw.com

**GREENBERG TRAURIG, LLP**  
 10845 Griffith Peak Drive, Suite 600  
 Las Vegas, Nevada 89135  
 Telephone: (702) 792-3773  
 Facsimile: (702) 792-9002

JARROD L. RICKARD, Bar No. 10203  
jlr@skrlawyers.com

KATIE L. CANNATA, Bar No. 14848  
klc@skrlawyers.com

**SEMENZA KIRCHER RICKARD**  
 10161 Park Run Drive, Suite 150  
 Las Vegas, Nevada 89145  
 Telephone: (702) 835-6803  
 Facsimile: (702) 920-8669

*Attorneys for Geoff Winkler, Receiver for  
 J&J Consulting Services, Inc., J&J Consulting  
 Services, Inc., J and J Purchasing LLC,  
 The Judd Irrevocable Trust, and BJ Holdings LLC*

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF NEVADA**

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff

vs.

MATTHEW WADE BEASLEY; et al.,

Defendants

THE JUDD IRREVOCABLE TRUST, et al.,

Relief Defendants

DAVID R. ZARO\*

dzaro@allenmatkins.com

JOSHUA A. del CASTILLO\*

jdelcastillo@allenmatkins.com

MATTHEW D. PHAM\*

mpham@allenmatkins.com

\*admitted *pro hac vice*

**ALLEN MATKINS LECK GAMBLE  
 MALLORY & NATSIS LLP**

865 South Figueroa Street, Suite 2800  
 Los Angeles, California 90017-2543

Telephone: (213) 622-5555

Facsimile: (213) 620-8816

CASE NO. 2:22-cv-00612-CDS-EJY

**STIPULATION AND ORDER TO  
 CONTINUE HEARING ON THE  
 RECEIVER'S MOTION TO COMPEL  
 OR ALTERNATIVE MOTION FOR  
 ORDER TO SHOW CAUSE WHY  
 CHRISTOPHER M. MADSEN  
 SHOULD NOT BE HELD IN  
 CONTEMPT FOR FAILURE TO  
 COMPLY WITH THIS COURT'S  
 ORDERS**

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1 Court appointed receiver Geoff Winkler (“Receiver”) by and through his counsel of  
2 record, the law firm of Greenberg Traurig, LLP; and Christopher M. Madsen (“Madsen”), by and  
3 through his counsel of record, the law firm of Pryor Cashman LLP, hereby stipulate as follows:

4 1. On June 2, 2023, the Receiver filed a Motion to Compel or Alternative Motion for  
5 Order to Show Cause why Christopher M. Madsen Should Not Be Held in Contempt for Failure  
6 to Comply With This Court’s Orders (the “Motion to Compel”). ECF Nos. 525, 526.

7 2. On June 16, 2023, Madsen filed, (a) an Opposition to the Motion to Compel (the  
8 “Opposition”), and (b) Cross-Motion for a Stay of All Actions and Proceedings of the Receiver  
9 Against Christopher Madsen Pending Final Settlement of This Action (the “Cross-Motion to  
10 Stay”). ECF Nos. 530, 531.

11 3. On June 23, 2023, the Receiver filed a Reply in Support of the Motion to Compel  
12 and Opposition to the Cross Motion to Stay. ECF Nos. 536, 537.

13 4. Following a June 29, 2023 Status Hearing, this Court entered a Minute Order  
14 setting a Status hearing on the Motion to Compel and Cross-Motion to Stay for July 31, 2023 at  
15 1:30 p.m. ECF No. 545.

16 5. Following the Receiver’s Motion to Compel, the parties have engaged in further  
17 communications and efforts pertaining to the documents, information, and funds the Receiver  
18 seeks from Madsen.

19 As such, and in furtherance of the foregoing referenced efforts:

20 A. The parties have agreed to continue the Status hearing on the Motion  
21 to Compel and the Cross-Motion to stay for an additional thirty (30) days.

22 B. Through the instant stipulation, the parties respectfully request this  
23 Court re-set the status hearing on the Motion to Compel and the Cross-Motion to  
24 Stay at the Court’s first availability after August 31, 2023.

25 C. As part of this stipulation, the parties respectfully request this Court  
26 refrain from ruling on the Motion to Compel and/or the Cross-Motion to Stay until  
27 at least August 31, 2023.

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D. In the event the parties fully resolve the dispute contemplated in the Motion to Compel and the Cross-Motion to Stay, the parties will advise the Court as soon as practically possible.

**ACCORDINGLY, IT IS SO STIPULATED AND AGREED**

DATED this 26th day of July 2023

**GREENBERG TRAURIG, LLP**

*/s/ Kara B. Hendricks*

KARA B. HENDRICKS, ESQ.

Nevada Bar No. 07743

JASON K. HICKS, ESQ.

Nevada Bar No. 13149

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Nevada Bar No. 014051

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\*admitted *pro hac vice*

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JARROD L. RICKARD, ESQ.

Nevada Bar No. 10203

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Nevada Bar No. 14848

*Attorneys for Geoff Winkler, Receiver for  
J&J Consulting Services, Inc., J&J  
Consulting Services, Inc., J and J  
Purchasing LLC, The Judd Irrevocable  
Trust, and BJ Holdings LLC*

DATED this 26th day of July 2023

**PRYOR CASHMAN LLP**

*/s/ John Giardino*

JOHN GIARDINO

New York Bar No. 1838671

7 Times Square

New York, NY 10036

Telephone: (212) 326-0829

Facsimile: (212) 326-0806

*Attorney for Christopher M. Madsen  
(Admitted Pro Hac Vice)*

**ORDER**

**IT IS HEREBY ORDERED** that:

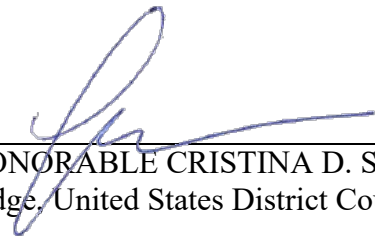
A. The Status hearing on the Motion to Compel and the Cross-Motion to Stay will be continued for an additional thirty (30) days, to be set on the Court's first available date after August 31, 2023.

B. The Court will refrain from ruling on the Motion to Compel and the Cross-Motion to Stay until at least August 31, 2023; and

C. In the event the parties fully resolve the dispute contemplated in the Motion to Compel and the Cross-Motion to Stay, the parties will advise the Court as soon as practically possible.

D. The July 31, 2023, status hearing is vacated and continued to **September 7, 2023, at 1:30 p.m.** in LV Courtroom 6B.

**IT IS SO ORDERED.**

  
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HONORABLE CRISTINA D. SILVA  
Judge, United States District Court

DATE: July 28, 2023